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Richmond, VA 23227
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To Regina Keeney FCC

Payphones → mfr

EX PARTE OR LATE FILED

Steven L. Holder
Vice President

CRESTAR

October 23, 1996

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OCT 24 1996

Federal Communications Commission
Office of Secretary

Regina Keeney
FCC, Chief - Common Carrier Bureau
1919 M. Street, Room 500
Washington DC 20554

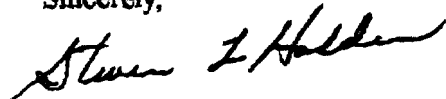
Dear : Regina

Re: Docket No. 96-128

I am writing to express my concerns regarding the above referenced Docket. By my interpretation, this allows Interexchange carriers to block access to selected toll free numbers. The implications of this are significant to our company, in that we not only rely heavily on toll free access to provide financial services to our geographically diverse customer base, but also rely on toll free numbers and corporate calling cards to provide employee access to internal numbers while on the road. This docket, coupled with the LECs option to block IXC calling cards, could result in rendering these types of access useless at many payphones.

In short I have no problem with PSPs being compensated for the use of their phones, however, I believe this can be accomplished without needless complications and burdens on the American consumer. Our objective should be to simplify the use of our nation's telecommunications network for our consumers, which means that they always have the right to choose how they place and pay for their calls. This can only result in healthy competition.

Sincerely,



Steven L. Holder

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18 October 1996



Regina Keeney
FCC, Chief - Common Carrier Bureau
1919 M Street, NW, Room 500,
Washington, DC 20554
RE: Docket No. 96-128

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OCT 24 1996
Federal Communications Commission
Office of Secretary

Dear Ms. Keeney,

I represent Access Health, Inc. and we are extremely concerned about the recent FCC Payphone Compensation order. The projected costs that will be imposed to the interexchange carriers or the payphone users is exorbitant and unacceptable. Undoubtedly, these costs will be passed along to the toll-free subscriber or calling card user. The projected cost of \$.35 per call is unreasonable and is simply a huge windfall for the payphone owners.

The effect on Access Health will be significant because of our use of toll-free and calling card services. Our customers use these services to reach us while our employees use toll-free numbers for calling card access. If the charges are imposed on the IXC's, the additional costs are likely to be passed on to us. This will represent undue hardship on our corporation. Since the \$.35 per call is not a market rate, we will, in effect, end up subsidizing pay phone owners. If the costs are passed on to the callers it defeats the purpose of toll-free calling. In either case, this is a windfall for payphone owners.

We urge you to reconsider the magnitude of the \$.35 per call and consider a more reasonable and fair charge. Thank you.

Sincerely



Thomas P. Jones, Jr.
Director, Data Center & Network Operations
Access Health, Inc.

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June 26, 1996



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EX PARTE OR LATE FILED

The Hertz Corporation
Worldwide Reservations
10401 N. Pennsylvania Avenue
Oklahoma City, Oklahoma 73120-4199

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OCT 24 1996

Federal Communications Commission
Office of Secretary

Ms. Dorothy Conway
Federal Communications Commission
1919 M Street, N.W. Room 234
Washington, D.C. 20554

Re: CC Docket No. 96-128

Dear Ms. Conway:

Please consider the following comments by the Hertz Corporation regarding the Federal Communications Commission's proposed Rules to Implement Payphone Provisions of the Telecom Act, referenced by docket number above. The specific portion of the rules upon which Hertz is providing comment is that which deals with all payphone service providers (PSPs) being compensated for each call originated by their payphones.

Hertz agrees with and supports the Commission's conclusion that the "carrier-pays" system would be a preferable compensation method for the reasons outlined in Sections III.2b.27 and 28; Hertz also believes the following additional reasons support that conclusion:

- We have concerns with the "set use fee", and the carriers' ability to accurately bill for the calls originating from payphones.
- We are also concerned with the proposed amount range of the "set use fee", and believe that the implementation of this compensation method would create a disproportionate burden on the Travel Industry as a whole, whose customer base often accesses the Industry's services while traveling via payphone.
- We believe that the "coin-deposit" method would create an unnecessary intermediate step to advertised toll-free numbers, and ultimately on industry services. Besides advertising toll-free numbers for car reservations, we have carefully provided for Emergency Roadside Assistance for our customers via a toll-free number. Erecting any barriers between that service and our customer with an emergency would be a disservice to consumers and indeed might endanger their safety.

We appreciate the Commission's consideration of these matters. If you have any questions or would like to discuss our position, please call me on 405-749-4125.

Sincerely,

DM (copy)

Deborah Mauldin
Telecommunications Manager
Hertz Worldwide Reservations Center

cc: Fred Grumman, Esq.
Wayne Bowman, Vice President
Pat Rogers, National Account Manager

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October 17, 1996



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The Hertz Corporation
Worldwide Reservations
10401 N. Pennsylvania Avenue
Oklahoma City, Oklahoma 73120-4199

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OCT 24 1996

Federal Communications Commission
Office of Secretary

Ms. Regina Keeney
FCC, Chief - Common Carrier Bureau
1919 M Street, NW, Room 500
Washington, DC 20554

Re: CC Docket No. 96-128

Dear Ms. Keeney:

Attached please find a letter to Ms. Dorothy Conway dated June 26, 1996, regarding same subject and the Hertz Corporation's position on the FCC Order related to Pay Phone Compensation. We have been informed that on September 20, 1996, the FCC released provisions to this order that adopt a "carrier-paid" system for compensation which the Hertz Corporation supports.

As a multi-million dollar annual subscriber to toll-free services, the Hertz Corporation would like to express concern with the amount of compensation proposed per call, as it is our belief that the cost associated with the carrier-pay system will ultimately be reflected in the Hertz Corporation's charges from the carrier.

It is urgent that the FCC consider the true cost for Pay Phone providers to furnish toll-free services to the carriers to ensure that rulings relating to this Order are equitable to all--providers, carriers, subscribers, and consumers.

We appreciate the opportunity to express our concerns to the Commission, and the Commission's further consideration on these Orders. If you have any questions, or would like to discuss our position, please call me on 405-749-4125.

Sincerely,

Deborah Mauldin
Telecommunications Manager
Hertz Worldwide Reservations Center

cc: Fred Grumman, Esq.
Wayne Bowman, Vice President
Pat Rogers, National Account Manager

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